BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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Federal Communications Commission
Office of the Secretary

In the Matter of	) NBP Public Notice # 8
	) GN Docket Nos. 09-47, 09-51, 09-137
Additional Comments Sought on Public Safety,	) PS Docket Nos. 06-229, 07-100, 07-114
Homeland Security, and Cybersecurity Elements	) WT Docket No. 06-150
Of National Broadband Plan	) CC Docket No. 94-102
	) WC Docket No. 05-196

COMMENTS OF THE WAUKESHA COUNTY DEPARTMENT OF EMERGENCY PREPAREDNESS

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I. INTRODUCTION

The Waukesha County Department of Emergency Preparedness has responsibility for the county's E9-1-1 PSAP and Dispatch Center, the countywide 800 MHz trunked voice radio system, the countywide 800 MHz data system, and Emergency Management. It provides and manages a number of services that the County's public safety agencies both rely and depend on. The Department of Emergency Preparedness of Waukesha County, Wisconsin, respectively provides these comments regarding the above captioned matters as it relates to the lack of availability of broadband technology for the public safety community. Specifically, we are concerned that current public systems available for data such as cellular are limited in coverage, security and reliability, and the current narrowband 800 MHz systems are limited in throughput.

II. BACKGROUND

Waukesha County is located in the southeast section of the state just west of the City of Milwaukee and Milwaukee County. The population of the county is 386,000 and is a mixture of urban and rural communities. There are thirty seven units of local government with most of them having their own police and fire departments.

Since 1989, the Department of Emergency Preparedness through its Radio Services Division has provided a countywide public safety mobile data 800 MHz system. Initially, this Mobile Data Computer (MDC) system utilized a single site, 19.2 kilobit, data only frequency in the 800 MHz band for public safety agencies within Waukesha County, Wisconsin. This system was used primarily for police officers to access the Department of Transportation (DOT) system for vehicle and persons queries as well as car to car and car to dispatch center non-voice communications. In 2005, this system was upgraded to a six site, five frequency, 32 kilobit MDC system for better coverage and higher throughput. Over the last two years a number of the Waukesha County police departments have migrated away from this countywide system to cellular provided services because of a lack of bandwidth in the 800 MHz data system. This move away from the countywide data system has limited our abilities in the areas of interoperability and agency sharing of information, and has isolated those agencies who now rely solely on a cellular solution that only permits them to communicate within their own agency.

When the mobile data system was first installed it provided a method of sharing data between the majority of county police department field units and their respective dispatch centers as well as dispatch center to dispatch center data communications. It also served as a backup system to the

analog voice trunked radio system. As a number of the dispatch centers within the county began replacing aging computer aided dispatch (CAD) systems they found a need to be able to send and receive larger amounts of data that the current 800 MHz data frequency system was not capable of doing. The system went from having 212 mobile units to 173 within the last two years. That is a loss of 19%, which is a significant impact on the number of units and a reduction of interoperability between public safety agencies.

III. DISCUSSION

The county's E9-1-1 PSAP and dispatch center needs a mobile data system that is capably of covering the 525 square miles of the county in order to provide dispatch services to the County Sheriff's Department, the 19 Police Departments and 21 Fire Departments the center dispatches for. The police departments need to rely on this MDC system to access data on drivers and vehicles as well as receive and send data relating to incidents they are dispatched to. In addition, our fire departments want to start using the MDC system to aid in the dispatch and response of units to incidents. Our dispatch center uses a computer aided dispatch (CAD) system that allows for incidents to be transmitted from the center to the field units that are required to respond. However, due to the lack of sufficient bandwidth this CAD system mobile application is extremely slow, not reliable and we have not been able to use this critical method of data sharing.

Many public safety entities around the country have switched from their own "private" (local government) 800 MHz data systems because of interference from cellular providers and a lack of bandwidth. They have switched to public cellular systems that usually do not provide the same coverage, but do provide an increase in bandwidth which expands their capabilities in the areas of amount and type of data available. However, the trade off is that they are now reliant on a system out of their control, influenced by cellular phone activity, which rely on cell sites that usually do not have sufficient back up power available to them. Most of the time these potential negatives do not interfere with the first responder's day to day activities, but when a significant incident does occur this system is much less reliable than a system under the control of that public safety entity. How does public safety depend on a system that isn't reliable all the time?

Many of the professional groups that either recommend or require standards for public safety agencies require certain standards be met to obtain certain levels of accreditation. As we move forward with new technologies such as NG9-1-1 our systems will need to accept and process more data. The New and Emerging Technologies 9-1-1 Improvement Act of 2008 has identified a number of devices and technology that if implemented will provide the 9-1-1 PSAPs in this country with much more data than they receive today. This data will be beneficial to responding units, but only if it can be delivered in a reliable method and in a timely manner. Current systems operated by public safety are not robust enough to deliver all this data to field units. One would expect that if we are capable of receiving this data in the 9-1-1 PSAP that we would be able to share it with the first responders.

This data will in turn become valuable information to those of us that are responsible for the safety and welfare of our citizens. This information must be available to all of public safety for planning and responding to significant incidents, both man-made and natural, that usually do not stop at the borders of one unit of local government. As a member of the Milwaukee Urban Area Security Initiative (UASI), our County has played a significant role in developing concepts and projects that foster a regional approach in data collection and dissemination. We realize that outdated networks and systems must be replaced or upgraded to accept and use data from newer technologies and devices if we want access to this valuable information.

IV. CONCLUSION

As a 9-1-1 Public Safety Answering Point and dispatch center we have historically focused on taking responsibility for answering and processing calls for assistance from individuals who dial 9-1-1 and then dispatching the appropriate public safety agencies. We worked within our own silos, kept the data we collected to ourselves, and were reluctant to share it with others. A couple of years ago we were forced to change our mind set with the proliferation of cell phones as the public now expects the PSAP to know where they, the caller, are just like we did when they called on their landline phone. With the public utilizing a number of devices that contain more data than just location and name, and the public's expectation that they will (or should) be able to access 9-1-1, the PSAPs must be capable of not only capturing this data, they must also be capable of transmitting it to responding public safety agency personnel. We must be willing to share this data with others as the typical borders that built these silos when 9-1-1 was just a land line technology no longer exist.

We believe public safety is in desperate need for a mobile data system that utilizes broadband technology, which has the necessary coverage and is reliable and secure. We believe that when significant incidents occur within communities, artificial borders do not apply to how we must respond; therefore we want to approach a system design on a regional approach. We believe the FCC now has the ability to grant licensing of 700 MHz broadband data frequencies for the use in public safety and we request they allow this to occur as soon as possible.

Respectfully Submitted,

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